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November 6, 2020

Filed Via ECF

Honorable Paul A. Engelmayer
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square, Room 2201
New York, NY 10007

Re: *Elodie Paroni v. Alstom SA, et al.*
Civil Action No.: 19 -cv-01034- PAE

Dear Hon. Paul A. Engelmayer:

Plaintiff is writing to apprise the Court on the progress the parties made regarding jurisdictional discovery, as well as to request an extension of the current schedule of deadlines. The reason for the delay is twofold. First, Plaintiff's counsel has been single handedly managing a case load that was larger than normal due to a temporary staffing issue within her firm. Secondly, in the midst of handling a larger than normal caseload, Plaintiff's counsel had an unforeseen medical emergency in her family as well as medical treatment of her own. More specifically, a member of undersigned counsel's family was hospitalized amidst the ongoing Covid-19 pandemic, which precluded any family from visiting or speaking directly with physicians other than by phone. Because undersigned counsel's family member was in a rural hospital, she worked to coordinate transfer to a more robust facility with physicians possessing the requisite specialty to treat her family member. These efforts took approximately one week to achieve. Additionally, undersigned counsel has a preexisting condition which requires treatment every eight-weeks; undersigned counsel experienced complications with her most recent treatment which left her unable to handle her workload for approximately five days.

The following items were completed timely: (1) Plaintiff has amended her complaint to add General Electric UK Holdings Ltd.; (2) Plaintiff served the newly named Defendant; (3) Plaintiff propounded written jurisdictional discovery to the newly named Defendant; and (4) Defendant timely responded to the written jurisdictional discovery requests.

Plaintiff is aware that the Court would like all jurisdictional discovery and motion practice to be complete by December. Plaintiff still believes year end completion of these tasks is attainable with the revised schedule as proposed by Plaintiff.

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Plaintiff's counsel has conferred with Defense counsel who advised that if the Court is amenable to the extension, Defense counsel consents to the proposed schedule.

Plaintiff proposes the following amended schedule:

1. Plaintiff must notice any depositions no later than 11/16/2020 (deposition, if noticed, to be conducted during the week of 11/16 and 11/30);
2. Jurisdictional discovery ends on 12/4/2020;
3. Plaintiff's letter indicating whether she will continue to pursue this action is due 12/7/2020;
4. General Electric UK Holdings Ltd.'s motion to dismiss for lack of personal jurisdiction, if any, is due 12/14/2020;
5. Plaintiff's opposition is due 12/18/2020;
6. General Electric UK Holdings Ltd.'s reply is due 12/22/2020.

Plaintiff greatly appreciates Your Honor's time and consideration in this matter, and should the Court need any further information we are available at the Court's convenience.

Respectfully Submitted,

/s/ Angela J. Nehmens

William A. Levin

Admitted Pro Hac Vice

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Counsel for Plaintiff

Granted. The Court will adopt the proposed scheduled and wishes counsel and her family well.

SO ORDERED.



PAUL A. ENGELMAYER

United States District Judge

November 9, 2020